

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

**IN RE: CENTURYLINK SALES
PRACTICES AND SECURITIES
LITIGATION**

This Document Relates to:

Civil Action No. 18-296 (MJD/KMM)

MDL No. 17-2795 (MJD/KMM)

**DECLARATION OF SARAH M.
LIGHTDALE IN SUPPORT OF
DEFENDANTS' REPLY
MEMORANDUM IN SUPPORT OF
DEFENDANTS' MOTION FOR
PROTECTIVE ORDER REGARDING
PLAINTIFFS' THIRD-PARTY
SUBPOENAS**

Oral Argument Requested

I, Sarah M. Lightdale, hereby declare as follows:

1. My name is Sarah M. Lightdale and I am a Partner with the law firm of Cooley LLP. I am a member in good standing of the bar of New York.
2. I serve as counsel to Defendants CenturyLink, Inc., Glen F. Post, III, R. Stewart Ewing, Jr., David D. Cole, Karen Puckett, Dean J. Douglas, and G. Clay Bailey in this matter.
3. I respectfully submit this declaration pursuant to 28 U.S.C. § 1746 in order to transmit to the Court certain documents referenced in Defendants' Reply Memorandum of Law in Support of Defendants' Motion for Protective Order Regarding Plaintiffs' Third-Party Subpoenas filed concurrently herewith.
4. I have personal knowledge of the facts set forth in this Declaration.

5. Exhibit B to Plaintiffs' Opposition [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6. Exhibit J to Plaintiffs' Opposition [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7. Attached as **Exhibit 20** is a true and correct copy of a document produced by Defendant CenturyLink, Inc. in this case, and bearing the Bates numbers CTLMNSEC00516517–519. This document was designated HIGHLY CONFIDENTIAL – ATTORNEY'S EYES ONLY under the October 19, 2019 Protective Order entered in this action (MDL Dkt. No. 464) and has been filed with the Court under seal.

8. Attached as **Exhibit 21** is a true and correct copy of a document produced by Defendant CenturyLink, Inc. in this case, and bearing the Bates numbers CTLMNSEC00516328–332. This document was designated HIGHLY CONFIDENTIAL – ATTORNEY'S EYES ONLY under the October 19, 2019 Protective

Order entered in this action (MDL Dkt. No. 464) and has been filed with the Court under seal.

I hereby declare under the penalty of perjury that the foregoing is true and correct.

Executed this 10th day of August, 2020, in New York, NY.

/s/ Sarah M. Lightdale

Sarah M. Lightdale